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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, NATIONAL  
TPS ALLIANCE, MARIELA GONZÁLEZ,  
FREDDY JOSE ARAPE RIVAS, M.H.,  
CECILIA DANIELA GONZÁLEZ  
HERRERA, ALBA CECILIA PURICA  
HERNÁNDEZ, E.R., HENDRINA VIVAS  
CASTILLO, A.C.A., SHERIKA BLANC,  
VILES DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF M.L. IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
COMPLIANCE**

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**DECLARATION OF M.L.**

I, M.L., declare:

1. I have lived in the United States since 2019. I came here as a student. I graduated with a bachelor's degree in advertising in 2023. I had work authorization for one year through the optional practical training program. Then, I applied for TPS because it was not safe for me to return to Venezuela. Thanks to TPS, I have been able to work and support myself in the United States. I am 26 years old.
2. I live in Ohio. I am a product manager for a tech company.
3. When TPS was extended in January 2025, I submitted applications to re-register for TPS and to renew my work permit. I received receipt notices for my TPS application and my work permit renewal on January 19, 2025.
4. My employer has been very attentive to my employment authorization and TPS throughout the year. I have had multiple meetings with H.R. and several times, I thought I was going to lose my job because of all of the changes to TPS and the USCIS website. It has been a very stressful time.
5. What I understand based on the USCIS website and information from groups like the National TPS Alliance and the Venezuelan American Caucus, is that I am authorized to work based on my renewal receipt, which automatically extends my employment authorization for 540 days beyond the expiration date on my EAD card.
6. Since May 30, when Judge Chen issued the order that clarified that people with renewal receipts benefit from the auto-extension, I have been relying on that information to make decisions about my life. I signed a lease agreement in June. I have car payments, utility bills, and other expenses that I assumed I would be able to cover with my income.
7. Now, my employer is saying that I have to provide updated employment authorization by next week. They said that, based on the information on the USCIS website, because I do not have an I-94 with an expiration date of April 2026, I will not be allowed to work. I have tried to explain that the automatic extension of my work permit is all that I need, but they refuse to accept it without other proof of status. My manager said that they are afraid that allowing me to work would put the company at risk.
8. I am in a state of panic now that I may lose my job. I don't know what I will do next. I am

afraid to return to Venezuela. I feel like I am living a nightmare.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 21, 2025 in Ohio.

ML

M.L.